

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

BURTON KRAUS,
individually and on behalf of all others similarly
situated,

Plaintiff,

-against-

SNOW TEETH WHITENING LLC d/b/a SNOW,
FORESOLD LLC d/b/a FORESOLD, JOSHUA
ELIZETXE, FLOYD MAYWEATHER, and
ROBERT JAMES GRONKOWSKI

Defendants.

Case No: 2:20-cv-06085-SJF-ST

**ANSWER TO COMPLAINT BY DEFENDANTS SNOW TEETH WHITENING LLC,
FORESOLD LLC, AND JOSHUA ELIZETXE**

Defendants Snow Teeth Whitening LLC (“Snow”), Foresold LLC (“Foresold”), and Joshua Elizetxe (collectively, “Snow Defendants”), by and through their undersigned counsel, hereby answer Plaintiff Burton Kraus’s Complaint as follows:

INTRODUCTION

This is a sham lawsuit that never should have been filed. Defendant Snow is a small and growing dental cosmetics startup founded to help ordinary consumers achieve better, longer-lasting bright smiles. Snow’s flagship product is a teeth-whitening system that has helped thousands of consumers demonstrably improve their smiles. The product works so well that thousands of Snow’s consumers post raving reviews about Snow’s products, including unequivocal before-and-after photos showing the product’s effect on their teeth and personality. Appended for the Court’s consideration is a small representative sampling of those reviews and voluntary customer-submitted photos which also are available on Snow’s website at www.trysnow.com/pages/reviews.

Plaintiff's lawyers appear to have recruited him to file this case to extort Snow and the celebrities who promoted its products, not to redress any actual harm. The Complaint is replete with false statements and misrepresentations. It names Robert Gronkowski, a four-time Super Bowl champion and future hall of famer, and Floyd Mayweather, an undefeated world champion who is widely considered to be among the best pound-for-pound boxers in history. As Plaintiff's lawyers know, neither of these individuals has anything to do with the purported misrepresentations cited in the pleading, and they have zero involvement in managing the company or making any sort of strategic business decisions regarding the marketing of Snow's products.

As to the various allegations in the Complaint, the Snow Defendants respond as follows:

Paragraph numbers in this Answer correspond to the Complaint's paragraph numbers and respond to the allegations of that paragraph, up to the Affirmative Defenses section. Snow Defendants note that the numbering of the paragraphs in the Complaint restarts at 1 after the first 17 paragraphs, and Snow Defendants have duplicated that error herein to avoid further confusion. To the extent that the headings in the Complaint outside of the numbered allegations are intended to be allegations as opposed to mere argument, Snow Defendants deny them. To the extent that Snow Defendants have not specifically denied any allegation of the Complaint, the allegations are denied.

NATURE OF THE ACTION

1. Snow Defendants admit that Snow markets and sells an excellent at-home teeth-whitening kit that includes a unique whitening serum and an LED light system. The remainder of this paragraph contains inaccurate argument and/or conclusions for which no response is required and statements that are simply false, such as that Snow mentioned COVID-19 in any of

its ads. To the extent any response is required, Snow Defendants deny the allegations in this paragraph.

2. Snow Defendants admit that Snow's teeth-whitening system is highly rated and has delivered positive results for hundreds of thousands of satisfied customers. Snow Defendants specifically deny that any scientifically valid "independent lab testing" has shown that Snow's system is ineffective; rather, as shown in Exhibit 1 and at www.trysnow.com/pages/reviews, Snow's products have delivered striking results for thousands of consumers (who were not recruited by Plaintiff's lawyers). This paragraph also contains argument and/or conclusions for which no response is required; to the extent any response is required, Snow Defendants deny the allegations in this paragraph.

3. Denied. Snow Defendants specifically deny that Snow has ever mentioned COVID-19 in any ads, much less suggested that teeth whitening products of any sort could protect against the coronavirus. This allegation is simply false.

4. Denied, except admitted that this paragraph includes a screenshot of an undated post purportedly from Snow's Instagram account, which speaks for itself.

5. Denied. Snow Defendants do not know what "advertisements and public statements" this paragraph refers to, and therefore lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegations, and on those grounds deny them. Snow Defendants also deny that Plaintiff is in any position to make in-court representations about what "studies" exist.

6. Denied.

7. Denied.

8. Denied. Snow Defendants note that the term “country” is not synonymous with “sovereign nation,” and there are well over 200 countries in the world (*see, e.g.*, The CIA World Factbook, <https://www.cia.gov/the-world-factbook/countries/>, listing 255 “countries.”).

9. Denied. Snow Defendants specifically deny that a single undated “complaint” purportedly filed with the Better Business Bureau “sums up” any of Snow Defendants’ “practices and products,” whatever that means.

10. Denied. In particular, Snow Defendants do not know what source this paragraph is quoting, and on that basis deny the allegations. This paragraph also contains argument and/or conclusions for which no response is required; to the extent any response is required, Snow Defendants deny the allegations in this paragraph.

THE PARTIES

11. Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in this paragraph and on that basis deny them.

12. Admitted.

13. Admitted.

14. Denied.

15. Admitted.

16. Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in this paragraph and on that basis deny them.

17. Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in this paragraph and on that basis deny them.

JURISDICTION AND VENUE

1. This paragraph states a legal argument and/or conclusion regarding subject matter jurisdiction as to which no response is required. Snow Defendants deny that Plaintiff has incurred any damages in this case. Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in this paragraph and on that basis deny them.

2. This paragraph states a legal argument and/or conclusion regarding personal jurisdiction as to which no response is required. Snow Defendants deny that they have committed any “tortious acts.” Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in this paragraph and on that basis deny them.

3. This paragraph states a legal argument and/or conclusion regarding venue as to which no response is required. Snow Defendants deny that they have committed any “tortious acts.” Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in this paragraph and on that basis deny them.

4. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “class” or “damages” in this case and that any advertising or marketing was “false and misleading.”

5. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “Class” in this case. Snow Defendants specifically deny that any of their products are “fraudulent.”

6. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “Class” in this case.

7. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “Class” in this case, that any advertisements or marketing materials were “false and misleading,” and that anyone was “injured” as a result of those materials.

8. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “Class” in this case. Snow Defendants specifically deny that the Plaintiff could ever be a satisfactory representative of the class.

9. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “Class” in this case. Snow Defendants specifically deny that the Mintz & Gold firm could ever be adequate representatives of any purported class, given information regarding the conduct of this suit that has come to light to date, and that will continue to be developed during discovery.

10. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph, including that there is any “Class” in this case.

11. Admitted.

12. Snow Defendants admit that Snow's at home teeth whitening kit is sold on trysnow.com, as well as through other major retailers. Snow Defendants specifically deny that any of Snow's products are "fraudulent." Any other allegations in this paragraph are denied.

13. Denied.

14. Denied because Snow Defendants do not know what this paragraph purports to refer to, except admitted that Snow sells an at home teeth whitening kit.

15. Snow Defendants lack knowledge or information sufficient to know what "numerous other companies" are doing, and on that basis deny the allegations in this paragraph.

16. Snow Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in this paragraph and on that basis deny them. Snow Defendants further deny that Crest Whitestrips have anything to do with Snow's products or are "in direct competition" with Snow.

17. Snow Defendants admit that this paragraph references written statements made on Mr. Elizetxe's LinkedIn page, which speak for themselves.

18. Snow Defendants admit that this paragraph purports to quote a portion of a statement on the www.trysnow.com website, which speaks for itself. Snow Defendants deny that this statement suggests that Snow has sold "31,500,000 products a year." Plaintiff appears to have confused (intentionally or otherwise) the number of seconds in a year (31,556,952) with Snow's statement, and then punctuates the error with an exclamation point to augment the shock value of the false allegation.

19. Snow Defendants admit that Mr. Gronkowski, a four-time Super Bowl champion and future hall of famer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and

Snow, has been compensated for promoting Snow's products. Any other allegations in this paragraph are denied.

20. Snow Defendants admit that Mr. Gronkowski, a four-time Super Bowl champion and future hall of famer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and Snow, made public statements that speak for themselves.

21. Snow Defendants admit that Snow's customers have written thousands of five-star reviews about the results they have seen using Snow's products. The remaining allegations in this paragraph are denied. In particular, it is not clear what statement this paragraph is referring to and Plaintiff does not attempt to identify a source.

22. Snow Defendants admit that Mr. Gronkowski, a four-time Super Bowl champion and future hall of famer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and Snow, has appeared in promotional YouTube videos. Any other allegations in this paragraph are denied.

23. Snow Defendants admit that Mr. Gronkowski, a four-time Super Bowl champion and future hall of famer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and Snow, has endorsed certain of Snow's products, including a Snow at-home teeth whitening system. Any other allegations in this paragraph are denied.

24. Snow Defendants admit that Mr. Mayweather, a lifetime undefeated world champion boxer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and Snow,

has been compensated for promoting Snow's products. Any other allegations in this paragraph are denied.

25. Snow Defendants admit that Mr. Mayweather is a lifetime undefeated world champion boxer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and Snow. Any other allegations in this paragraph are denied.

26. Snow Defendants admit that Mr. Mayweather is a lifetime undefeated world champion boxer who has nothing at all to do with the allegations in this complaint and was named as a defendant purely in an effort to generate media attention and extort him and Snow. Any other allegations in this paragraph are denied.

27. Snow Defendants admit that www.trysnow.com is currently the most popular oral care website by website traffic as reported by Alexa.com. Any other allegations in this paragraph are denied.

28. Snow Defendants admit that Snow's customers have written thousands of five-star reviews about the results they have seen using Snow's products. The remaining allegations in this paragraph are denied. In particular, it is not clear what statement this paragraph is referring to and Plaintiff does not attempt to identify a source.

29. It is not clear what this paragraph is purporting to quote, and Plaintiff does not attempt to identify a source; and on that basis the allegations are denied.

30. Snow Defendants admit that Snow advertises its products through its social media accounts. Any other allegations in this paragraph are denied.

31. Snow Defendants admit that Snow controls the Instagram accounts @Snowteethwhitening and @Snowresults. Any other allegations in this paragraph are denied.

32. Snow Defendants admit that Snow controls the Twitter account @Snowteethwhiten. Any other allegations in this paragraph are denied.

33. Snow Defendants admit that Snow has a Facebook page. Any other allegations in this paragraph are denied. Snow Defendants specifically deny that they have made any “false claims.”

34. Snow Defendants lack sufficient knowledge or information to form a belief about the truth or falsity of the allegations in this paragraph, and on that basis deny them. Snow Defendants specifically deny that any of Snow’s products are “Fraudulent.”

35. Snow Defendants admit that this paragraph refers to an article in Oprah Magazine, which Plaintiff does not allege to have seen. Any other allegations in this paragraph are denied.

36. Snow Defendants admit that Snow does not claim or require FDA “approval” for its products. Any other allegations in this paragraph are denied.

37. This allegation is misleading, as it suggests that FDA “approv[al]” was sought, which it was not, and on that basis Snow Defendants deny this paragraph.

38. Snow Defendants admit that this paragraph purports to reference an article on truthinadvertising.org, which speaks for itself and which Plaintiff does not allege to have seen. Any other allegations in this paragraph are denied.

39. Snow Defendants admit that Snow advertises its products. Any other allegations in this paragraph are denied.

40. Snow Defendants admit that there are various posts on the @Snowteethwhitening Instagram account, which speak for themselves, none of which Plaintiff alleges to have seen. Any other allegations in this paragraph are denied.

41. Snow Defendants admit that there are various posts on the @Snowteethwhitening Instagram account, which speak for themselves, none of which Plaintiff alleges to have seen. Any other allegations in this paragraph are denied.

42. Denied.

43. Snow Defendants admit that there are various posts on the @Snowteethwhiten Twitter account, which speak for themselves, none of which Plaintiff alleges to have seen. Any other allegations in this paragraph are denied.

44. Denied on the grounds that (i) this allegation is false and (ii) Plaintiff has no knowledge or other basis to make a substantive allegation regarding Snow's proprietary products.

45. Snow Defendants admit that Snow sells a product called the "Desensitizing Serum" for customers who already suffer from sensitive teeth. Plaintiff's intentional misstatements contained in this paragraph regarding the purpose and nature of this product are false and are denied.

46. Snow Defendants admit that Snow's customers have written thousands of five-star reviews about the results they have seen using Snow's products. It is unclear what "whitening strips" this paragraph is referring to or on what basis Plaintiff makes these allegations, such that Snow Defendants lack sufficient knowledge or information to form a belief about the truth or falsity of the remaining allegations, and on that basis deny them.

47. Snow Defendants admit that an LED mouthpiece is included in Snow's at home teeth whitening kit. Any other allegations in this paragraph are denied.

48. Denied. Snow Defendants specifically deny that any scientifically valid "independent lab testing" exists that has concluded that Snow's system, which includes both

whitening serum and an LED mouthpiece, is somehow not effective. Thousands of satisfied customers indicate otherwise. Any other allegations in this paragraph are denied.

49. Denied.

50. Denied on the grounds that (i) this allegation is false and (ii) Plaintiff has no knowledge or other basis to make a substantive allegation regarding Snow's proprietary products.

51. Snow Defendants admit that "photocatalyst" is a term with a scientifically accepted definition. Any other allegations in this paragraph are denied.

52. Denied on the grounds that (i) this allegation is false and (ii) Plaintiff has no knowledge or other basis to make a substantive allegation regarding Snow's proprietary products.

53. Denied on the grounds that (i) this allegation is false and (ii) Plaintiff has no knowledge or other basis to make a substantive allegation regarding Snow's proprietary products.

54. Snow Defendants admit that Snow's products are not the only whitening products that exist on the market. It is not clear what whitening products or "competitors" this paragraph is referring to, but choosing cheaper products and declaring them to be substitutes and/or competitors is intentionally misleading, and Snow Defendants deny the allegation on those grounds. Any other allegations in this paragraph are denied.

55. Snow Defendants admit that Snow's products are not the only whitening products that exist on the market. It is not clear what other whitening products this paragraph is referring to or why Plaintiff believes them to be "arguably comparable," and on that basis the remainder of this argumentative paragraph, to the extent any response is required, is denied.

56. Snow Defendants admit that the LED mouthpiece is a part of the effective Snow teeth-whitening system. The remaining allegations in this paragraph are denied, as it is not clear what statement this paragraph is referring to and Plaintiff does not attempt to identify a source.

57. Denied.

58. Snow Defendants admit that Snow offers customers a 100% money back guarantee based on results, meaning that if a customer does not achieve the guaranteed results Snow will refund the purchase price. Such guarantees are commonplace, and the allegation that “it is a scientific fact that there are teeth that cannot be whitened” has nothing to do with the nature of that guarantee. The remainder of this argumentative paragraph, to the extent any response is required, is denied.

59. Snow Defendants admit that Snow has various social media accounts, and statements made on those accounts, none of which Plaintiff alleges to have seen, speak for themselves. Any other allegations in this paragraph are denied.

60. Snow Defendants admit that this paragraph purports to reference statements on Allure’s website, none of which Plaintiff alleges to have seen, which speak for themselves. Any other allegations in this paragraph are denied.

61. Snow Defendants admit that this paragraph purports to reference a statement on the www.trysnow.com website and statements in various magazines, none of which Plaintiff alleges to have seen, which speak for themselves. Any other allegations in this paragraph are denied.

62. Snow Defendants admit that this paragraph purports to reference a statement on the www.trysnow.com website and statements in various magazines, none of which Plaintiff

alleges to have seen, which speak for themselves. Any other allegations in this paragraph are denied.

63. Denied.

64. Denied. Plaintiff does not have any knowledge or other basis to make allegations regarding the resources Snow has devoted to research and development in developing its proprietary teeth-whitening system. The fact that Plaintiff is making allegations regarding development efforts by a company of which Plaintiff has no personal knowledge further demonstrates the bad-faith nature of this lawsuit.

65. Denied. Plaintiff's inclusion of this false allegation is intended only to smear and embarrass Mr. Elizetxe, further demonstrating the bad-faith nature of this lawsuit.

66. Denied. The Snow Defendants have never mentioned COVID-19 in any ads, much less suggested that teeth whitening products of any sort could protect against the coronavirus. This allegation is false. To the extent a response is required to any other allegation in this paragraph, it is denied.

FIRST COUNT

67. Snow Defendants repeat and incorporate their responses to each of the allegations contained in the preceding paragraphs as if fully set forth herein.

68. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

69. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

70. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

71. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

72. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

73. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

SECOND COUNT

74. Snow Defendants repeat and incorporate their responses to each of the allegations contained in the preceding paragraphs as if fully set forth herein.

75. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

76. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

77. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

THIRD COUNT

78. Snow Defendants repeat and incorporate their responses to each of the allegations contained in the preceding paragraphs as if fully set forth herein.

79. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

80. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

81. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

82. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

83. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

84. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

FOURTH COUNT

85. Snow Defendants repeat and incorporate their responses to each of the allegations contained in the preceding paragraphs as if fully set forth herein.

86. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

87. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

88. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

89. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

90. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

91. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

92. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

93. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

FIFTH COUNT

94. Snow Defendants repeat and incorporate their responses to each of the allegations contained in the preceding paragraphs as if fully set forth herein.

95. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

96. This paragraph states a legal argument and/or conclusion for which no response is required. To the extent a response is required, Snow Defendants deny the allegations in this paragraph.

AFFIRMATIVE DEFENSES

Snow Defendants set forth below their defenses and affirmative defenses. Each defense and affirmative defense is asserted as to all claims against it. By setting forth these defenses and affirmative defenses, Snow Defendants do not assume the burden of proving any fact, issue or element of a claim where such burden properly belongs to Plaintiff. Snow Defendants reserve

the right to allege additional defenses and affirmative defenses as they become known or as they evolve during litigation, and to bring counterclaims if so appropriate.

FIRST DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff fails to state a claim and/or sufficient facts upon which relief can be granted.

SECOND DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are knowingly false, legally frivolous and brought for an improper purpose.

THIRD DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff lacks standing to pursue his claims and/or seek any relief against Defendants.

FOURTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of unclean hands.

FIFTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrine of waiver.

SIXTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's purported causes of action are barred or otherwise limited to the extent that Plaintiff has failed to mitigate or avoid the purported damages alleged.

SEVENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the First Amendment.

EIGHTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are moot.

NINTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims were procured through champerty, maintenance and barratry.

TENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims were brought for wrongful purposes and constitute an abuse of the legal process.

ELEVENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are not capable of certification as a "class action" in accordance with Fed. Rule of Civil Proc. 23.

TWELTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff is not an adequate class representative and his lawyers are not adequate class counsel.

THIRTEENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff has suffered no actual injury and has not been damaged in any amount.

FOURTEENTH DEFENSE AND AFFIRMATIVE DEFENSE

Defendants were not the cause of any purported injury Plaintiff has alleged.

FIFTEENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of accord and satisfaction.

SIXTEENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the doctrine of estoppel.

SEVENTEENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff is seeking to recover damages that are speculative in nature, impossible to ascertain, unrecoverable, or not cognizable.

EIGHTEENTH DEFENSE AND AFFIRMATIVE DEFENSE

Plaintiff has failed to preserve documents and materials likely to lead to the discovery of relevant evidence.

PRAYER FOR RELIEF

Wherefore, Snow Defendants respectfully request that the Court:

- A. Enter judgment in favor of Defendants and against Plaintiff on all alleged claims for relief.
- B. Deny certification of any purported “class” of injured consumers.
- C. Dismiss Plaintiff’s claims with prejudice.
- D. Require Plaintiff and/or his lawyers to pay all of Defendants’ attorney’s fees and costs in defending this action.
- E. Require Plaintiff and/or his lawyers to pay all of Defendants’ recoverable costs in accordance with Fed. Rule of Civ. Proc. 68.
- F. Grant such other and further relief as the Court deems just and proper.

Dated: March 12, 2021

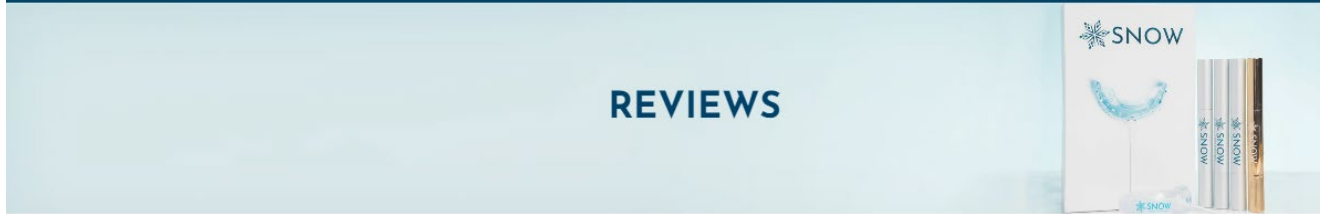
Respectfully Submitted,

By: /s/ J. Noah Hagey
J. Noah Hagey

J. Noah Hagey
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*Counsel for Defendants Snow Teeth
Whitening LLC, Foresold LLC, Joshua
Elizetxe, and Floyd Mayweather, and Co-
counsel for Defendant Robert James
Gronkowski*












EXHIBIT 1



REAL PEOPLE. REAL RESULTS.

These are real SNOW® customer reviews and before and after teeth whitening photos submitted to us within the last 30 days. SNOW® is loved by nearly 1 million users. See for yourself how 97% see results after just one use (consumer study) and 100% after 21 days. For more customer reviews, visit [Best Buy](#), [Amazon](#), [Target](#) or any of our other premium retail partners. You may also view more transformations on [YouTube](#).

★★★★★ 3,655 Reviews

 <p>Luis A. </p> <p>★★★★★</p> <p>The before and after photos speak for themselves! I was blown away by the results in as little as a week. My teeth are very sensitive but the whitening serum gives no pain whatsoever. I used it for 15 minutes once a day and the results were seen right away. Would definitely recommend this product for anyone - go for it you won't be disappointed!</p> <p> New Wireless Teeth Whitening System (LIMITED SERIES)</p>	 <p>Vicki L. </p> <p>★★★★★</p> <p>I love this product so much I gave to 6 members of my family for Christmas. It is easy and fast. Results are awesome with daily use.</p> <p> 1-Year of Snow Teeth Whitening Wands</p>	 <p>Julia L. </p> <p>★★★★★</p> <p>I love this and even my Dentist and dental hygienist asked me what I use to whiten my teeth. They said they were very impressed.</p> <p> The Wireless Teeth Whitening Kit (2nd Generation)</p>	 <p>Mariam R. </p> <p>★★★★★</p>
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Maureen U. ✓

★★★★★

I always wondered how coffee drinkers like me had such white teeth. Now I know. I just kept myself occupied working for 30 minutes a day while my teeth were being whitened. Great product.



The Ultimate Gift Bundle (Best Seller) *\$249 Value*



Katherine T. ✓

★★★★★

Love Snow!



Snow® Rejuvenating Lip Treatment



Vickie G. ✓

★★★★★

I bought this product after seeing my nephew's results. I was still skeptical if it would work for me, but my results have been amazing.



The Accelerating LED Mouthpiece

Love snow whitening! I've bleached my teeth for years with traditional trays and it seems like that application stopped working. I was thrilled to find something that worked again!



New Wireless Teeth Whitening System (LIMITED SERIES)



Edward H. ✓

★★★★★

It started out as a Christmas gift for family and then I purchased one myself. Now I use it more than the ones I purchased as a gift for.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Olivia H. ✓

★★★★★

Lip Balm helpful for not feeling so stretched and with dry lip. Used mine during a morning walk... Couldn't feel a bit of the brisk, cold winter weather. Thank You, SNOW



Colleen P. ✓

★★★★★

Very easy to do. Perfect during COVID:) my husband and I both did the 21 days and feel like it made a difference. Much easier and cheaper than going to the dentist!



New Wireless Teeth Whitening System (LIMITED SERIES)



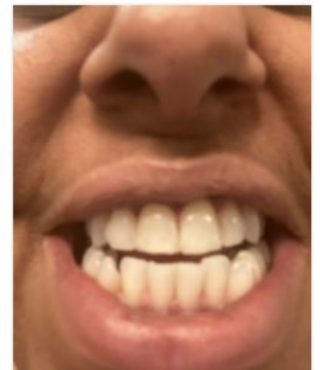
Rhonda G. ✓

★★★★★

Very easy to use and the results are great.



Snow® At-Home Teeth Whitening Kit





Darla H. ✓

★★★★★

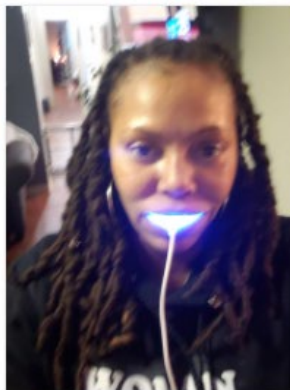
This is by far the BEST tooth whitening treatment on the market!! I was hesitant to try, as my actual dentist office treatment had very little improvement and cost a whopping \$500. I decided to give the 21 day challenge a try, and MY OH MY!!!! My teeth are WHITE!!!! I had stopped wearing red or dark shades of lipstick as my teeth were so stained, but no more!! I had no sensitivity to the product and have recommended the product to family and friends!!



Sandra C. ✓

★★★★★

My teeth were so yellow i was embarrassed to smile. Within the first 5 treatments the appearance of my teeth was so improved i could smile with confidence.



Tenisha M. ✓

★★★★★

Very easy use. No teeth sensitivity afterwards, have recommended to friends and family.. I LOVE SNOW



Patricia B. ✓

★★★★★

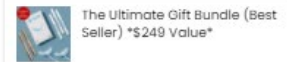
I had some difficulty getting the product but customer service was wonderful and i did eventually get it. If i use it two or more days in a row i definitely get sensitivity. So now i use it twice a week (one day the max strength for 21 minutes and the other the regular strength for 21 minutes) and i LOVE the results and no longer have any sensitivity. I would HIGHLY recommend SNOW teeth whitening.



Amber S. ✓

★★★★★

I commend you for hiring Vanessa Pulido. She is absolutely amazing! I experienced a couple of problems with my delivery and she stepped in and expeditiously resolved all my problems! She is professional, kind AND thorough! Boy, you guys really lucked up with her!! THANK YOU VANESSA PULIDO FROM AMINAH BILAL



Racheal C. ✓

★★★★★

I love it my teeth look 10 times better and i stopped smoking so i really see tge difference now. I love snow i don't know what i'd do without it. Thank you so much for putting this out!!!!



Randy L. ✓

★★★★★

I wasn't sure if Snow was the right product for me, but after three days i could see a big improvement. My wife started noticing the improvement as well.



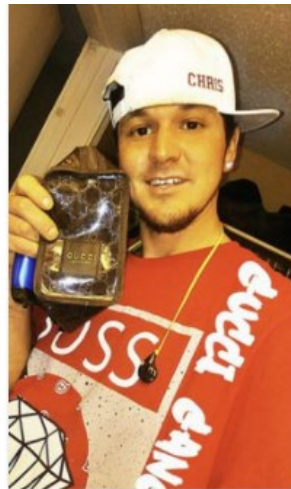
Cindy R. ✓

★★★★★

Its great! And really works.



Snow® At-Home Teeth Whitening Kit (ALL-IN-ONE)



More

Add to Story

Christopher H. ✓

★★★★★

I love it and I wanna order more thank y'all I love this Snow White product may god bless yall



New Wireless Teeth Whitening System (LIMITED SERIES)



Cherrie B. ✓

★★★★★

I absolutely love my snow tooth whitening system! I love seeing my teeth whiter it gives me great confidence and I'm so happy I bought it!!! Thanks for such a great at home product! ☺



The Ultimate Gift Bundle (Best Seller) *\$249 Value*

Amber S. ✓

★★★★★

This is my favorite part of my beauty routine. It's fun it's simple it's cool it's instantly satisfying.



Snow® At-Home Teeth Whitening Kit



Denise L. ✓

★★★★★

People are definately noticing my teeth are whiter. I get compliments all the time. I started seeing results in about 2 sessions. This is amazing!! I will continue using it! Professional results at an affordable price!!!

Best,

Denise



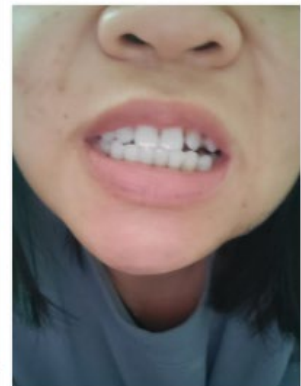
Snow® At-Home Teeth Whitening Kit (ALL-IN-ONE)



noticing the improvement as well. I love it!



Snow® At-Home Teeth Whitening Kit



Tram P. ✓

★★★★★

It was good and it really works



The Extra Strength Whitening Serum



Danielle B. ✓

★★★★★



Austin C. ✓

★★★★★

All I can say is I'm confident in my smile!!



The Whitening Toothpaste



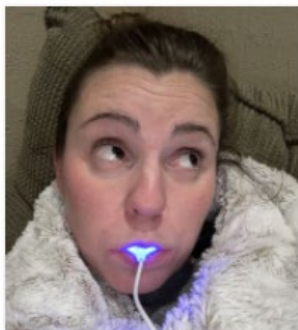
Muofhe K. ✓

★★★★★

This product is great. You can see the gradual improvement from day!! Thanks Snow! :)



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

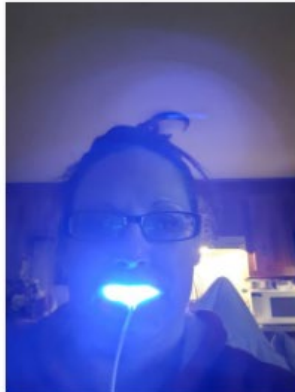


★★★★★

I ordered my husband one his teeth are really yellow! First use amazing results



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



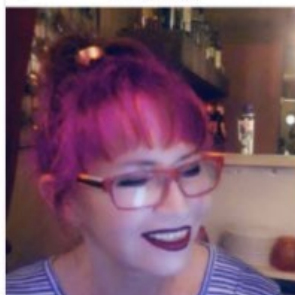
Holly F. ✓

★★★★★

I have paid hundreds of dollars for professional Whitening through my dentist and didn't see the slightest change. I noticed a change in the color of my teeth in the first use of snow!



The Extra Strength Whitening Serum



Marlene A. ✓

★★★★★

I see a great difference after less than 10 uses. I wanted to post a before and after but only my before uploaded. The product is great and very easy to use.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



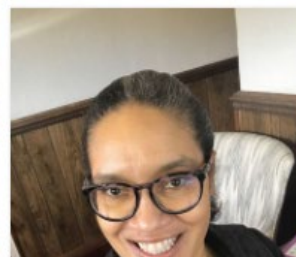
Susan M. ✓

★★★★★

I couldn't find anything that worked in the uk. The results are amazing after just one week! Absolutely brilliant!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



nuspama one and this works!! Get it



1-Year of Snow Teeth Whitening Wands



Kelly T. ✓

★★★★★

My daughter and I finished up with braces and Invisalign and wanted to whiten up our teeth post procedure. In a very short time, we both have had amazing results.



The Ultimate Gift Bundle (Best Seller) *\$249 Value*



Christine T. ✓

★★★★★

I have had yellow teeth my whole life and none of the dentist prescribed whiteners worked for me. This has been just the thing I needed to boost my confidence.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

Elizabeth W. ✓

★★★★★

I have only used Snow for three days and can already tell my teeth are whiter!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Sue D. ✓

★★★★★

I bought all my kids kits for Christmas and they said it was their favorite gift!!! LOL



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Noah B. ✓

★★★★★

I love that I didn't get sensitivity



Kathy Mininni Kraft



Like



Comment

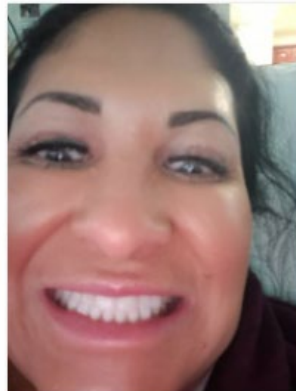
Virginia M. ✓

★★★★★

Just worked



The Extra Strength Whitening Serum



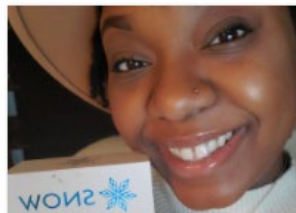
Suzana M. ✓

★★★★★

I love the convenience of whitening my teeth in 30 minutes while driving to work!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Olga M. ✓

★★★★★

My chin has broken out but I'm trying to determine if one s masks or peroxide. Product is great and is working with continual use. Definitely see the difference! Happy customer!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



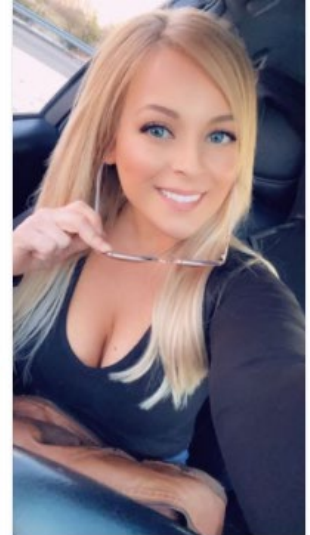
EDWIN L. ✓

★★★★★

Great product and it really works. Great investment.



Dual-light, WIRELESS, Self-Sanitizing Snow® Smart Teeth Whitening At-Home System



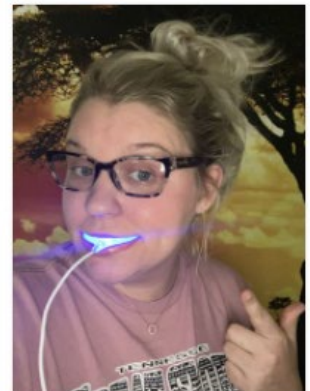
Marissa B. ✓

★★★★★

I get compliments all the time about how white my teeth are!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Mary G. ✓


★★★★★

No sensitivity, I see results every

Noah B. ✓

★★★★★

Love that I didn't get sensitivity. Results take wayyy longer than people say though. Stay with it though 💎



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)




Donnesha M.

★★★★★

Great product! I could see the results in two weeks




Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

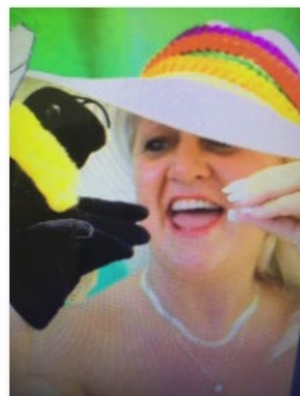
Donnesha M.

★★★★★

I have used for two weeks and definitely seeing results




Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



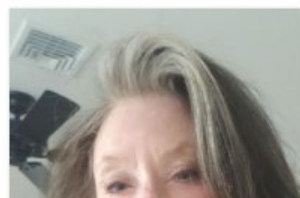

Marianne A. ✓

★★★★★

I wanted to buy the special year supply it was out of stock - I would like discount price




The Ultimate Gift Bundle (Best Seller) *\$249 Value*

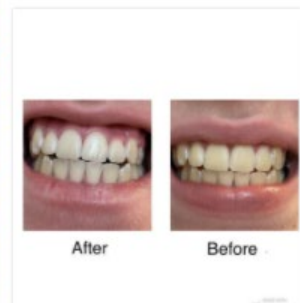
Darcelle W. ✓

★★★★★

I absolutely love it, the results were instant.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Jackie K. ✓

★★★★★

It is very easy to use and my son loves his!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Melodie B. ✓


★★★★★

I have been using this product. You

Mary G. ✓

★★★★★

No sensitivity, I see results every time I use this product. I use as often as possible, went from everyday to every other day then two to three times a week, it varies. But I absolutely love Snow. It has become part of a routine. And it really works. Like I mean it works so good.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



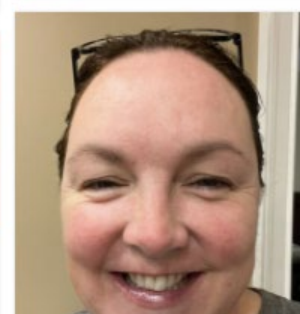
Nadia L. ✓

★★★★★

I love this with a passion!!! So done with messy strips that don't stick half the time. I will share again with before and after pics down the line. Thank you!!!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)





Jan L. ✓



Best product EVER!!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



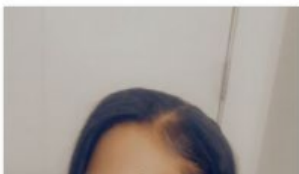
Stephanie M. ✓



It's an awesome product!! I see results after just 1 use now!! Would definitely recommend to anyone!



The Extra Strength Whitening Serum | Subscription



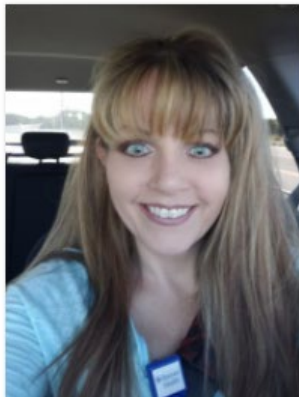
Jan L. ✓



Amazing product!! My dentist said he'd have a difficult time matching a cap to the whiteness of my teeth. My teeth have always been really white. Now they're amazing!



The Extra Strength Whitening Serum



Tara H.



I have always used whiteners but nothing like this one. I noticed a big difference after the first use. I did it faithfully for 10 days and now do it twice a week. Works beautifully! Need refills 😊



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

each night and whiten your teeth. The first try it whitened my teeth better than a professional session with my dentist.



The Wireless Teeth Whitening Kits Bundle



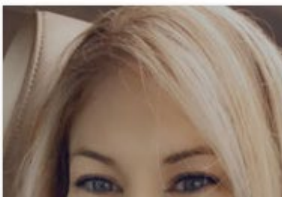
Jan S. ✓



I love how easy it is to use, quick and simple. And results are awesome!



The Whitening Wands



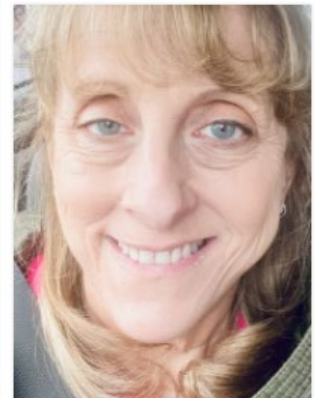
Lisa W. ✓



Easy to use!



1-Year of Snow Teeth Whitening Wands



Judy R. ✓

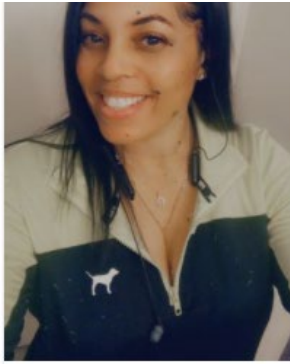


I've had yellow teeth for as long as I can remember and I thought it was just in my DNA. I've always wanted to have whiter teeth so I thought why not try snow! It has worked so well for me and now I just use it a couple of times a week for maintenance.



The Whitening Wands





Phyllice J. ✓

★★★★★

I am so skeptical of things but this was a proven ! I love it and have been reordering ever since. The only thing is my discounts are never applied 😊



The Extra Strength Whitening Serum



Britiany H. ✓

★★★★★

I've used white strips before but haven't received results as great as this!



Dual-light, WIRELESS, Self-Sanitizing Snow® Smart Teeth Whitening At-Home System



Whitening Kit (ALL-IN-ONE)



Brian A. ✓

★★★★★

Love this product. My teeth are whiter, no sensitivity at all, overall an amazing experience!!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



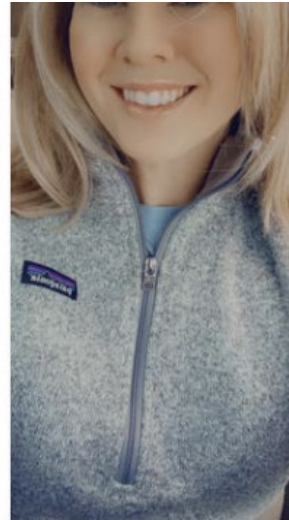
John B. ✓

★★★★★

Love it highly recomend!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



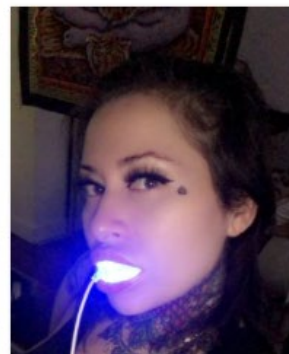
Shannon R. ✓

★★★★★

I use to have very white teeth and was always happy with them until about a year ago I noticed them looking less white in photographs, I was recommended a few different whitening products and didn't see results so stopped. I then ordered snow and was wowed after my very first try which was shocking !



Snow® At-Home Teeth Whitening Kit



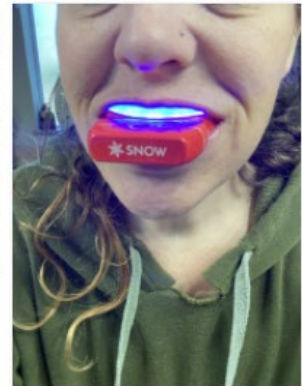
Bobbie H.

★★★★★

Love! Love! Love!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



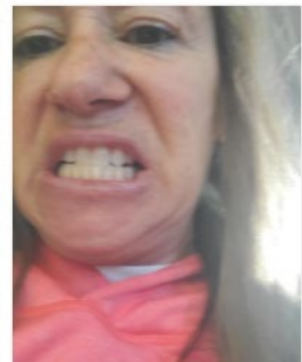
Stephanie P. ✓

★★★★★

Great unit... love results... i have bought them and given them as gifts to all my family!!



New Wireless Teeth Whitening System (LIMITED SERIES)





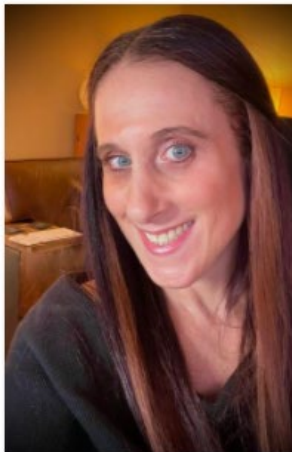
Brandee W. ✓

★★★★★

Love this, no sensitivity at all!! Had so many problems when I tried whitening strips.



New Wireless Teeth Whitening System (LIMITED SERIES)



Judith L. ✓

★★★★☆

I'm just at 11 sessions, and I have bonding on my teeth as well as crowns on all my molars, so I wasn't sure if this would work, previous whitening treatments (even from my dentist) haven't. I was losing hope with Snow, but I am finally seeing improvement, my teeth are perhaps 3-4 shades whiter, after about 2.5 months. I think it just might take longer if you have treated teeth. I am hoping for further results.

 Snow® At Home Teeth



Vonzell L. ✓

★★★★★

It works great



The Extra Strength Whitening Serum



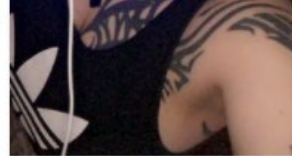
Peter S. ✓

★★★★★

This is super easy to use and frankly because I use my phone as the power source, I finally manage to do something productive while I am on social media.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Jeanette H. ✓

★★★★★

I have stains from prolonged coffee, wine drinking, and smoking. I use this wand on the darker spots on my teeth and it works!!! I haven't seen my teeth this white since high school! I Love Snow!!



The Extra Strength Whitening Serum



Ron P. ✓

★★★★☆

Day 4 with Extra strength syrup. Definitely see a difference already. Sweet.



The Extra Strength Whitening Serum

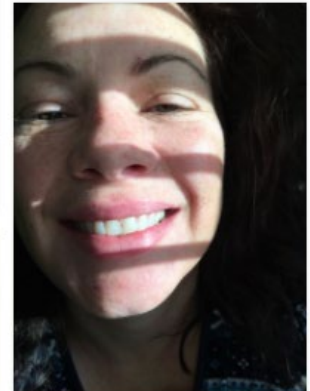
Vicki L. ✓

★★★★★

I loved this product so much u bought it for all my family members for Christmas. Great price easy to use



The Original Teeth Whitening Kits Bundle



Andrea W. ✓

★★★★★

Money well spent. Very happy with the results!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)





Richard F.



My teeth but you never carry white they look much better now.



The Whitening Wands



Mariella R.



Great product! I started seeing great results after 5 uses



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



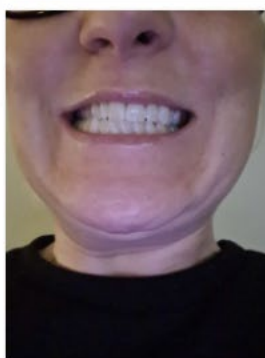
Kenny M.



Awesome Product!



1-Year of Snow Teeth Whitening Wands



Jeanie A.



Snow is Fast working. I love it!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Matt B.



Such a fantastic product. Me and my girlfriend each have one and love it. Super easy to use!



The Extra Strength Whitening Serum



Danielle B.



This is after 4 uses and I'm already ordering my husband one!! We love it! Wish I had ordered the wireless one but either way it's amazing! I have no sensitivity like I would normally either!! I shared it on Facebook to all my friends and family and many are ordering now!! Thank you SNOW



The Accelerating LED Mouthpiece



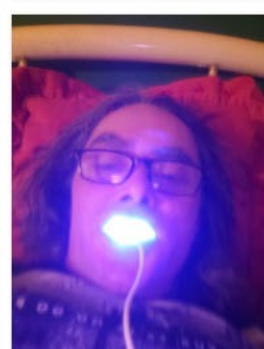
Brian A.



I love this stuff, I have sensitive gums and this has caused no sensitivity yet and great results



The Wireless Teeth Whitening Kit (2nd Generation)



Jack D.



this product will make your teeth white again...

you just have to wait for quite awhile until you can get the perfectly, clean and very white teeth that you want.

I knew that the whitening LED mouthpiece and whitening pen would get rid of the yellow stains. I just wanted to get my teeth very white and then keep using the whitening kit to continue make my teeth even more whiter! I'm getting there but I want to completely get rid of the stains around my gum line...



The Accelerating LED Mouthpiece



Rachel M.



Absolutely love my Snow wireless kit. I noticed a difference with my teeth after one session, but I will continue treatment to get the best results possible. A really well designed kit with a protective case too. It is so easy to use and you can be whitening your teeth while cooking, painting, reading... whatever you're doing really.



The Wireless Teeth Whitening Kit (2nd Generation)



Roxanne H. ✓

★★★★★

I have been pleased with my results! I'm glad I tried it and would recommend it highly



The Whitening Wands



Yoni T. ✓

★★★★★

Loved it!



The Original Teeth Whitening Kits Bundle



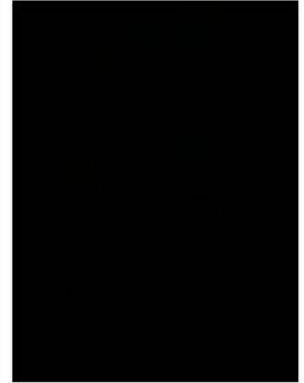
Phyllice J. ✓

★★★★★

Definitely invest in the maximum strength pens and then routine maintenance thereafter! I am a hard sell but so grateful I invested! I will be purchasing for my husbands and kids next!!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Andrew D. ✓

★★★★★

Saw some changes after a few sessions



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Kelvin T. ✓

★★★★★

I'm in love with how it's changed my life



Floyd Mayweather's Snow Teeth Whitening™ At-Home System [All-in-One Kit]



Laurence B. ✓

★★★★☆

For 30 minutes a night, the Snow treatment is making a difference!



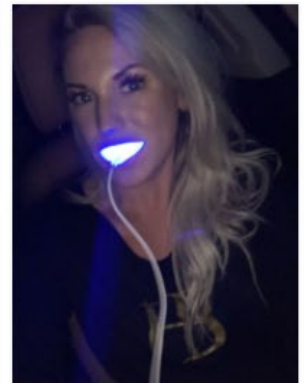
Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Stefanie D.

★★★★★

I was absolutely amazed after my first use. I was definitely skeptical because the before/after I saw



Natasha P. ✓

★★★★★

Love this product!



The Extra Strength Whitening Serum | Subscription





Krisztian F. ✓

★★★★★

I just love it the product works well



The Whitening Wands



Cheri C. ✓

★★★★★

I love the product and I have been posting my photos on Facebook. Would highly recommend.



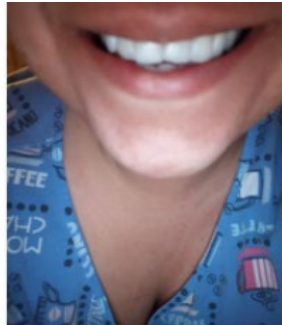
Extra Strength Teeth Whitening Serum



Sylvia L. ✓

★★★★★

After completing SNOW for 21 days



Victoria A. ✓

★★★★★

Its amazing 😊



Snow® At Home Teeth Whitening KIT (ALL-IN-ONE)



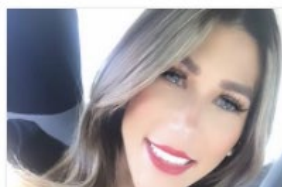
Natalie W. ✓

★★★★★

Fantastic product. I have my smile back.



The Extra Strength Whitening Serum



that it ended up looking the same way. I guess because it was night time when I did my before picture and only had my bathroom lights. I think all of my other ones were during the day. I used this the maximum amount of time for the first 12 days. Twice a day, 30 minutes each time. So I guess ...



1-Year of Snow Teeth Whitening Wands



Darlene H. ✓

★★★★★

MY smile is getting whiter, but the extra strength serum is my favorite!!

I will order only extra strength when I run out of the two I have.

Thanks for the 40% for my next order if I posted a photo !

Darlene



The Extra Strength Whitening Serum | Subscription



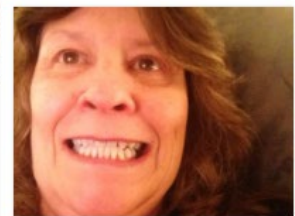
Dawn H. ✓

★★★★★

I love my coffee and red wine, but my smile doesn't. I use the Snow Whitening System and purchase the gold tubes to keep my smile natural and stain free. At 63, I want to look healthy and a nice smile certainly helps.



The Extra Strength Whitening Serum



Tammy O. ✓

★★★★★

Snow is the greatest teeth whitening system I have come across. I have spent allot of money on different whitening products. None of them compare to Snow.



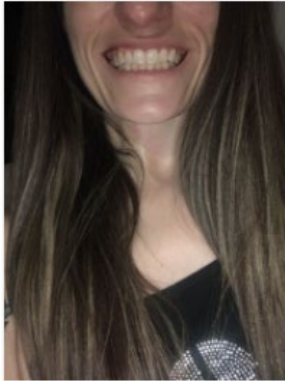
The Extra Strength Whitening Serum



a coffee drinker and I have dental work done so for it to work definitely shocked me, I will be ordering more of the extra strength whitening serum! Thank you SNOW!



The Wireless Teeth Whitening Kit (2nd Generation)



Sharon C. ✓

★★★★★

I absolutely love it.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



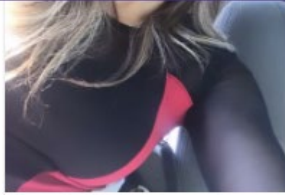
KRISTEN H. ✓

★★★★★

Great product!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Anna L. ✓

★★★★★

I've tried many teeth whitening kits, always ended with a false promise. SNOW WHITE delivers 100%. Will definitely keep purchasing and will be recommending to my friends and family. 🙌



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Mindy V. ✓

★★★★★

I love the fact that I can use it with many different devices! I love that there is no sensitivity for me and what an amazing smile after 1-3 uses! I want that celebrity white smile and this is just how to get it!



Addie y. ✓

★★★★★

It works and I've already order more do the whitening gel.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Maryanne N. ✓

★★★★★

Definitely love this product and will recommend to all my friends and family.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Pam M. ✓

★★★★★

Love how my teeth look and everyone tells me my teeth are beautiful!



The Extra Strength Whitening Serum



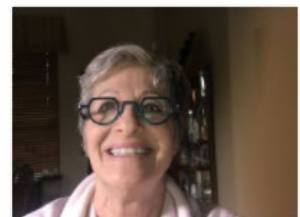
Allen H. ✓

★★★★★

Very impressed with the outcome. Much whiter.



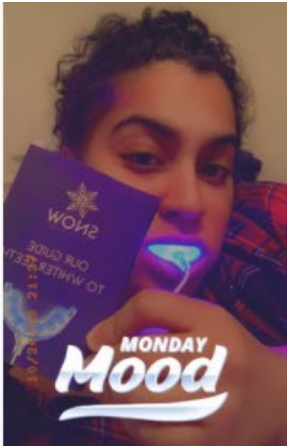
Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Jacqueline P. ✓

★★★★★

I have bought it for myself and my adult children and a friend!



Natasha P. ✓

★★★★★

Absolutely love this works amazingly definitely not a scam. Also brought it up to my dentist what she definitely thought was good due to the non-sensitivity works amazing I'm very pleased.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Perry L. ✓

★★★★★

Love it



SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - [Subscription Plan: 1 x Extra Strength & 1 x FREE Floss]



Whitening Wands



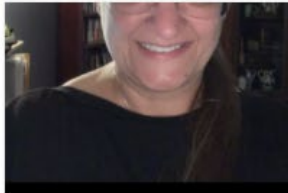
Gail M. ✓

★★★★★

It seems to be working.



SPECIAL DEAL | Whitening Bundle Pack



April. ✓

★★★★★

Absolutely love it! I was skeptical but it works really great!!! Just as advertised.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Louisa C. ✓

★★★★★

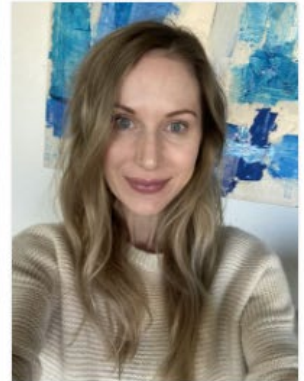
Love love love this product I saw results after first use



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - SUBSCRIPTION [Plan: 1 x Extra Strength & 1 x FREE Floss]



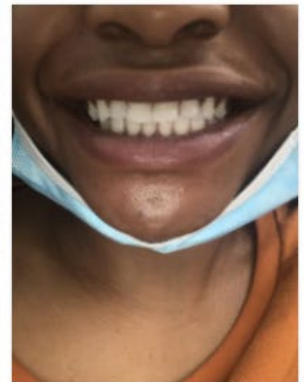
Sheila H. ✓

★★★★★

Love!



Snow® Rejuvenating Lip Treatment



Utoria V. ✓

★★★★★

Great! Easy to use




Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

Perry L. ✓

★★★★★

Love it



SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - [Subscription Plan: 1 x Extra Strength & 1 x FREE Floss]



Tammy O. ✓

★★★★★

I love this product. My fiancé and a couple other friends are now interested in this product. The only thing I have found to work on my teeth.



The Extra Strength Whitening Serum



Jessica R. ✓

★★★★★

I love this product. I was skeptical at first but the end result really



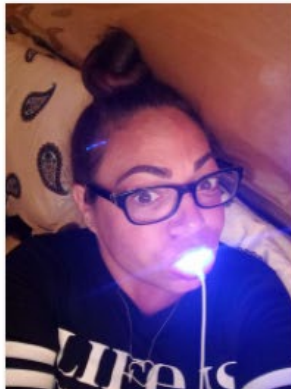
Sarah C. ✓

★★★★★

Love everything about this product.



The Extra Strength Whitening Serum | Subscription



Jennifer D. ✓

★★★★★

My teeth are the whitest they've ever been and EVERYONE notices!!! I will use this product forever!!!



The Extra Strength Whitening Serum



Robert J. ✓

★★★★★

I saw the before and after pictures of real customers and thought I would give it a try. I only focused on trying the top teeth for my first couple of weeks. I chew tobacco and have for years. Trust me when I tell you that my top teeth were just as yellow and stained as my bottom teeth. After seeing the amazing whitening of those upper teeth, I did the same thing for my bottoms and wow!!! I have a brand new smile that I don't feel like I have to hide with my hand covering my mouth anymore. ...



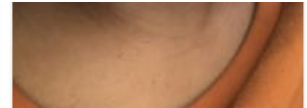
The Extra Strength Whitening Serum



Gralyn R. ✓

★★★★★

Great product...already purchased



Utoria V. ✓

★★★★★

Great! Easy to use



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Angela L. ✓

★★★★★

I completed a 21 day challenge with my daughter and we saw positive progression after the very first week!



SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - SUBSCRIPTION [Plan: 1 x Extra Strength & 1 x FREE Floss]




Freda B. ✓

at first but the end result really sold me. I need another for my bestie- she's been wondering what the secret is 🤔😁 it's SNOW

 SPECIAL DEAL | Whitening Bundle Pack



Jan L. ✓
★★★★★
My dentist didn't recommend whitening my teeth, he said my teeth were the whitest that he'd seen, and that I wouldn't see much difference from the charts he'd shown me. Always been happy with how white they are, but I just thought they could be brighter. Decided to give your product a try figuring, why not? Nothing to lose. So happy that I did! Really works, and I couldn't be more delighted with the results. Highly recommend!!

 1-Year of Snow Teeth Whitening Wands



Irene. ✓
★★★★★
The toothpaste is great and a wonderful compliment to the snow whitening system. The flavor is gray and happy to say not too sweet! Will definitely continue to use.


 The Whitening Toothpaste



Barbara N. ✓
★★★★★
Received my kit and the mouthpiece did not work. CS was excellent! I received a new mouthpiece immediately. Product is so easy to use. No sensitivity and my teeth are white! Will only use this product from now on.

 Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

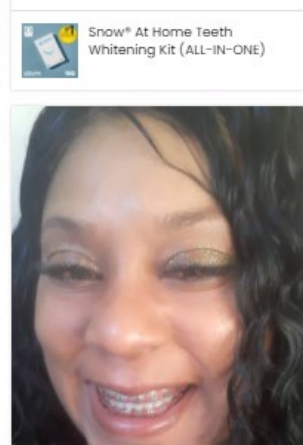
Great product...already purchased a second one. Thanks!

 SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - SUBSCRIPTION [Plan: 1 x Extra Strength & 1 x FREE Floss]



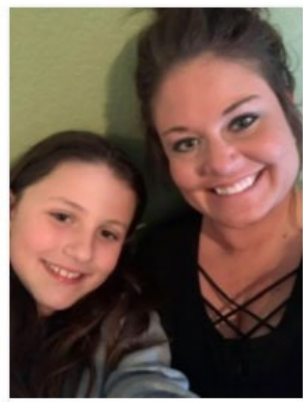
Cody. ✓
★★★★★
Pretty decent. Maybe missed it myself but should label each tube different. I'm always grabbing a different one. So I marked them with sharpie. And maybe make them clear to see how much you have left. Unless I missed that too haha

 Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



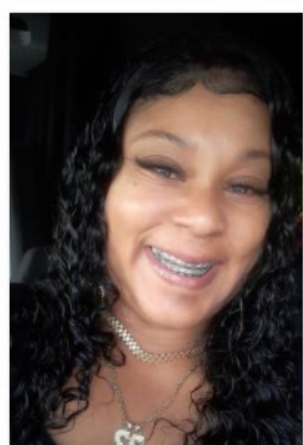
★★★★★
Love it! I have recommended it to most of my siblings after they saw results. I have received a lot of compliments.

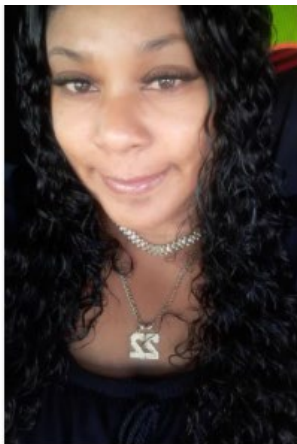
 The Extra Strength Whitening Serum



Brooke H. ✓
★★★★★
Love it!

 Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)





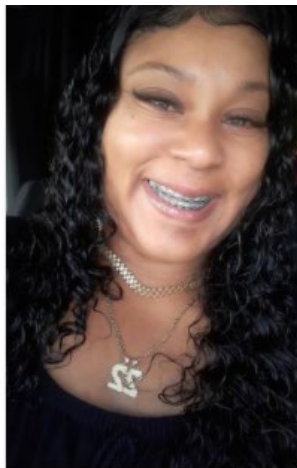
Sheila F. ✓

★★★★★

💜💜💜 love it.



Snow® Rejuvenating Lip Treatment



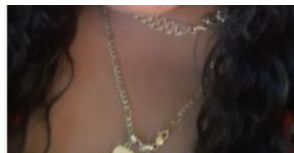
Sheila F. ✓

★★★★★

I love it. Thanks for everything



The Extra Strength Whitening Serum



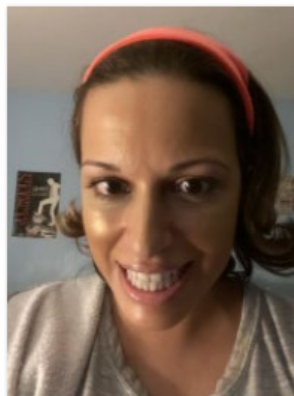
Sheila F. ✓

★★★★★

Thanks for everything



The Desensitizing Serum



Harleen B. ✓

★★★★★

I love ❤️ that my teeth 🦷 are looking much whiter now then before. It's very easy to use and I just love ❤️ the results now.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Taryn O. ✓

★★★★★



Sheila F. ✓

★★★★★

Its wonderful



1-Year of Snow Teeth Whitening Wands



Alphonse L. ✓

★★★★★

I did not have a lot of brightening to do, but I have begun to notice a change after about a week and a half of use



The Luxury Card Bundle



Ericka F. ✓

★★★★★

I like it alot



Richard H. ✓

I like it alot



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Kevin K. ✓

★★★★☆

Easy to use and seems to work well. Likely going to change from regular to extra strength wands



The Whitening Wands



Tina A. ✓

★★★★☆

★★★★☆

This product whitened my teeth by a few shades and caused no pain or sensitivity at all! I'm happy with the results and would recommend the extra strength solution



SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - SUBSCRIPTION [Plan: 1 x Extra Strength & 1 x FREE Floss]



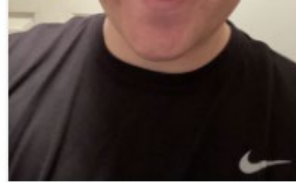
sarah. ✓

★★★★☆

No sensitivity at all!! Started to see a difference after about 7 uses.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Matt K. ✓

★★★★☆

Love the results. Will continue to use for sure



Replacement wireless mouthpiece



Michael P. ✓

★★★★☆

Snow white product is the best. I Will recommend anyone who wants to get your teeth white. Thanks Snow white Teeth products



1-Year of Snow Teeth Whitening Wands



Richard H. ✓

★★★★☆

The 6 gold 6 silver wand bundle is the best deal. I will be whitening my teeth for a long time with long these last. The products work great and I don't experience sensitivity.



SPECIAL DEAL | Whitening Bundle Pack



Tina. ✓

★★★★☆

Love the product! Buying a kit for my son for Christmas :-)



1-Year of Snow Teeth Whitening Wands



Rebecca T.

★★★★☆

I love this product



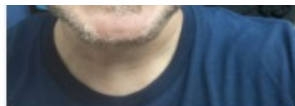
Michael P. ✓

★★★★★

Snow white tee product is the best thing that I invested in I recommend this tooth product to anybody which I have been doing since I invest in it thank you Teeth whitening



1-Year of Snow Teeth Whitening Wands



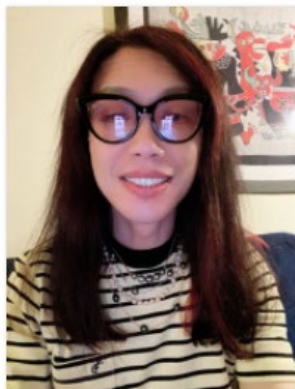
Damon H. ✓

★★★★★

was skeptical At first but the best decision and money spent



SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - SUBSCRIPTION [Plan: 1 x Extra Strength & 1 x FREE Floss]



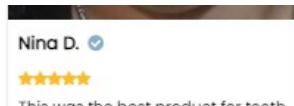
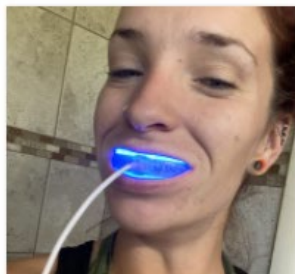
Stephen W. ✓

★★★★★

It's a bit pricey, but it worthwhile every dime



SPECIAL DEAL | Whitening Bundle Pack



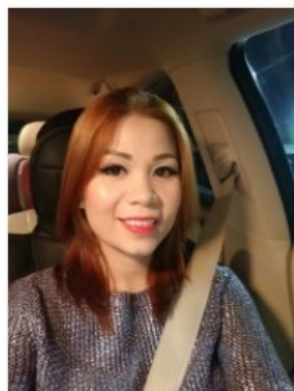
Nina D. ✓

★★★★★

This was the best product for teeth whitening. I'm definitely in love with this product ❤️❤️ Thanks Snow



SNOW® SMILE FOR LIFE CLUB | Includes: Snow At-Home Teeth Whitening (ALL-IN-ONE KIT) - SUBSCRIPTION [Plan: 1 x Extra Strength & 1 x FREE Floss]



Lam V. ✓

★★★★★

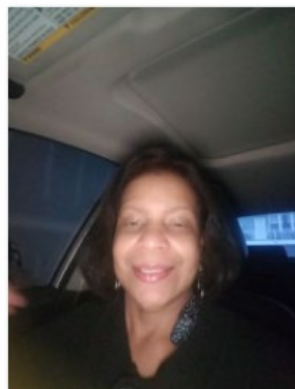
Really good product, and best price



The Extra Strength Whitening Serum



SNOW® At-Home Teeth Whitening Kit (ALL-IN-ONE)



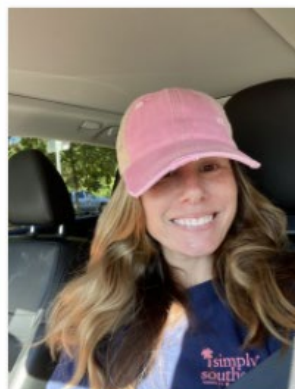
Barbara T. ✓

★★★★★

I absolutely love the Rejuvenating Lip Treatment. It makes your lips feel so soft and moisturized. As soon as you put it on your lip instantly feel smooth and silky. It even smells soothing. You definitely won't be disappointed.

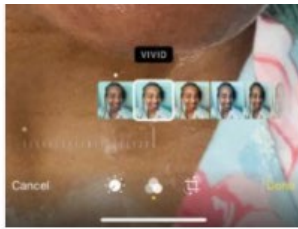


Snow® Rejuvenating Lip Treatment



Shanna E. ✓

★★★★★



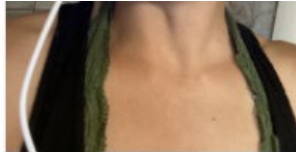
Tracy R. ✓

★★★★★

Your product works, Thanks



The Extra Strength Whitening Serum



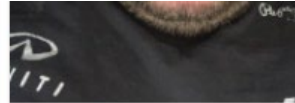
Breanna . ✓

★★★★★

Seriously the best in teeth whitening, and it's so simple to use! Plug it into your phone, set a timer, and go about your nightly routine!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Sven H. ✓

★★★★★

I've been very happy with Snow, and the results that I've had since using it. When enquiring about teeth whitening at my dentist, prior to using Snow. I was quoted £3k to have my teeth whitened. Snow is a fraction of the price, and the results are fantastic.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)

★★★★★

Bought another set for my boyfriend who is a coffee daily drinker as well as tea and sodas and smoked for 15 years. After 2 uses he saw a huge difference and uses it weekly now. We love snow



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Sami A. ✓

★★★★★

Can't be happier



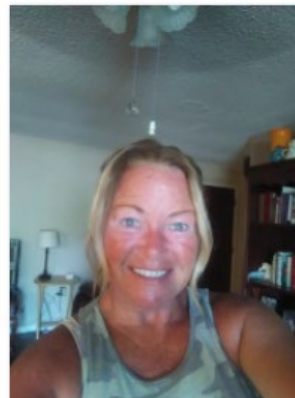
Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Marcie B. ✓

★★★★★

Very pleased with Snow Whitening. I have been recommending it to friends. I will definitely continue using mine, and purchasing products.



Kathleen M. ✓

★★★★★

Love this product!!!! It's the 1st whitening product I used that really worked!



The Extra Strength Whitening Serum



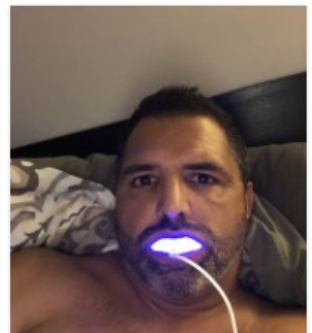
Kimberly W. ✓

★★★★★

I smile more than ever, since using my SNOW WHITE



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)





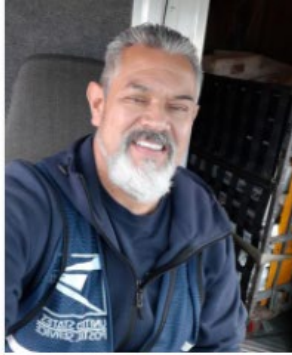
Nicholas M. ✓

★★★★★

Great product. Will continue using



The Wireless Teeth Whitening Kit (2nd Generation)



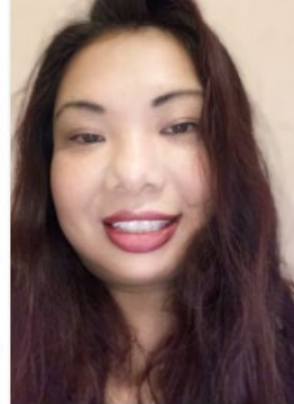
Roberto R. ✓

★★★★★

I have shared my experience with family and friends. My coworkers ordered snow after showing my results. I even ordered snow toothpaste which I enjoy. The whole teeth whitening system is Very easy to use . Thanks Snow



SPECIAL DEAL | Whitening Bundle Pack



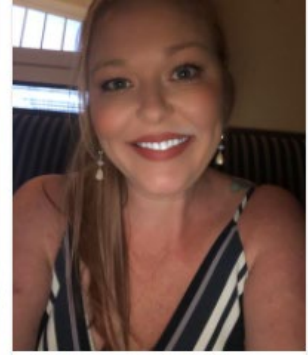
Maruth. ✓

★★★★★

Amazing product that promise positive result.



1-Year of Snow Teeth Whitening Wands



Jade H. ✓

★★★★★

Love this product!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



James G. ✓

★★★★★

Love the product



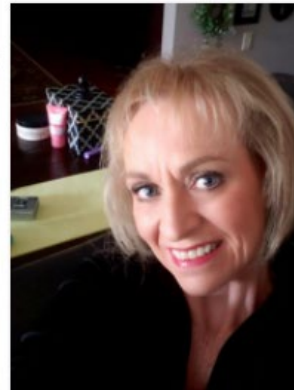
1-Year of Snow Teeth Whitening Wands



Stacy S.

★★★★★

Love everything about snow!! I have the whitening kit. And just received the whitening toothpaste. Absolutely love it!! Makes my mouth feel so clean and minty



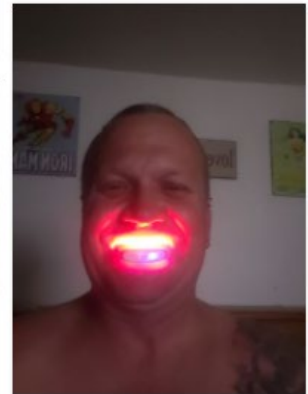
Dixie W. ✓

★★★★★

Love this product... love the customer service... they both are exactly what they say they are.



The Extra Strength Whitening Serum



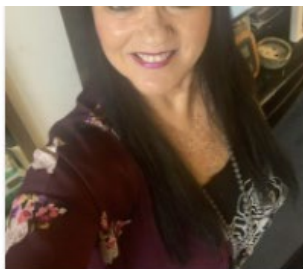
James G. ✓

★★★★★

Seen it on Most Expensivest, and I ordered it before the show ended, got me the wireless , the wife I got wired just to see if she liked it, a year worth of serums, I'm glad I did, I love the red light for killing Gingivitis



The Accelerating LED Mouthpiece



IsMurphy22@aol.com M. ✓

★★★★★

Love my snow kit even though I have to admit I don't get to use it every day! I'm raising two grandkids and I'm so busy! But I definitely recommend this product!!

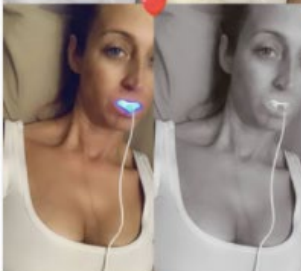
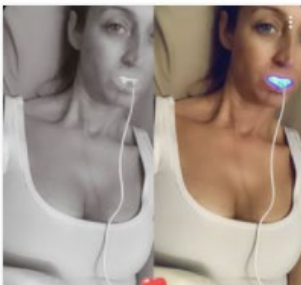


The Whitening Toothpaste

...give this a try!! Well worth the money spent. And so easy to use the kit!!



The Whitening Toothpaste



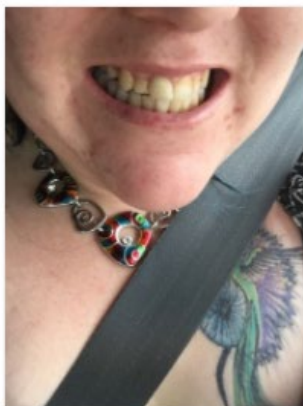
Jamie F. ✓

★★★★★

Love it, don't use it like I probably should but it doesn't take long and still saw results!



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



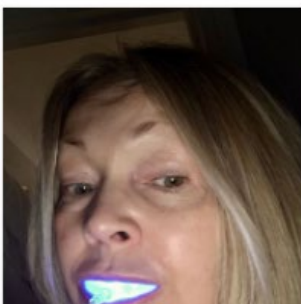
Tegan W. ✓

★★★★★

Fast delivery. Very happy with product. Thanks guys



Snow® Teeth Whitening At-Home System (All-in-One Kit) - 15% OFF



Charlie F. ✓

★★★★★

I have been able to do the teeth whitening each day easily. Before I go to bed it has become a day to day routine. My friends have all noticed my teeth are whiter.



Snow® Rejuvenating Lip Treatment



Anthony S. ✓

★★★★★

I love your product and I have told my friends and family and bought your product for a coworker and she loves it. I feel that I could be a great ambassador for your product and would love to be part of the Snow family! My phone number is 760-835-1543. stewartanthony421@gmail.com.

I did have an issue with my whiting wireless unit when it stopped working, after 4 months!

I have been in the service industry for 36 years and never had an experience that I received by Zack, not sure of last name ...



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Claire W. ✓

★★★★★



Erica G. ✓

★★★★★

I see a huge difference in how the yellow stains have gone away




The Wireless Teeth Whitening Kit (2nd Generation)



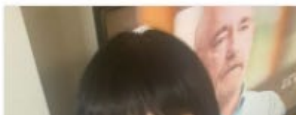
sarah c. ✓

★★★★★

If you want your teeth as white as possible as fast as possible, you have to get the maximum strength serum. I somehow lost the tube that came with my kit not very long after it was delivered and only used it about 4 times. After I lost it, I continued with the regular strength serum but it just wasn't doing enough for me. Once I ordered and received the bundle I started using the maximum strength again and it did not take long at all before my teeth were as white as I believe they can be. I lov...



SPECIAL DEAL | Whitening Bundle Pack



LOVE IT!!



1-Year of Snow Teeth Whitening Wands



Maria R. ✓

★★★★★

Love the way my teeth look now. No more yellow.



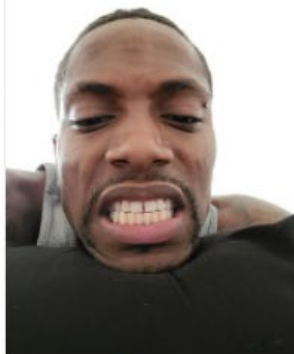
Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Bob . ✓

★★★★★

Loving this stuff. May even let my beard "go natural" now, since the white will match the white of my teeth! ;-))



Timothy S. ✓

★★★★★

Great product



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Thomas . ✓

★★★★★

Teeth were whiter and started feeling better about my appearance 😊.



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)



Carlos A. ✓

★★★★★

It's a good product like it!



Snow® At-Home Teeth Whitening Kit



Cindy R. ✓

★★★★★

Omg I love it would love to advertise this



Snow® At Home Teeth Whitening Kit (ALL-IN-ONE)





IsMurphy22@aol.com M. ✓

★★★★★

I love Snow and would most definitely recommend it to everyone who wants their teeth white and this product works! Thanks!



white will match the white of my teeth! ;-))



Mike . ✓

★★★★★

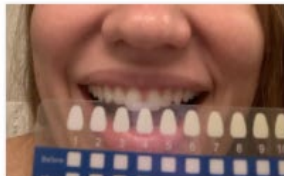
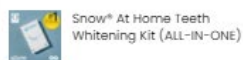
Brilliant thanks. Did exactly what was being sold



SADE T. ✓

★★★★★

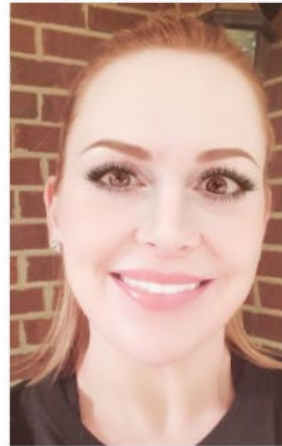
I really love my system and enjoy the experience definitely worth the money



Elizabeth . ✓

★★★★★

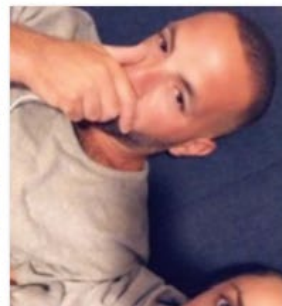
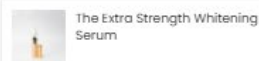
I am so impressed by the results!!! Moving quickly whiter and whiter. I drink a lot of Diet Coke and this has helped me dramatically after just a few uses.



Jennifer S. ✓

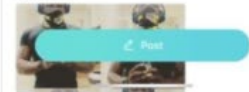
★★★★★

I love my SNOW whitening system. I got wonderful results in a week using it everyday for 10 minutes. I used the extra strength formula and didn't have any sensitivity. I have recommended SNOW to everyone and I mean everyone. I'm a Selling Manager at Saks Fifth Avenue and I get asked at least 8 times a day how I get my teeth so white. Its happened so much I just pull up the website for them lol. Thanks SNOW!!! I LOVE my new pearly white smile.



Kenny Johnson ✓

Workout Flow. Health is Wealth
See Translation



Kenny J. ✓

★★★★★

Love it!



Carlos G. ✓

★★★★★

Best Teeth Whitening ever!! Really work incredibly



Kelvin T. ✓

★★★★★



Brian F. ✓

★★★★★

Well worth the purchase. I drink a lot of coffee & tea and wine on the weekend. This keeps my teeth looking sparkling white. Easy to use and results are fast.



Carissa Star S. ✓

★★★★★

I absolutely love my SNOW kit! I use it religiously and have seen amazing results that other whitening kits have been unable to produce for me in the past. I loved it so much I bought an extra one for my daughter and now my whole family uses it!

